

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

JAY PAUL DERATANY, individually,	)	
and as agent of JAY PAUL DERATANY	)	
& ASSOC., LTD., an Illinois	)	
Professional Corporation,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	No. 08 CV 3372
	)	
DELL FINANCIAL SERVICES, a Texas	)	Judge Milton I. Shadur
Corporation, and LTD. FINANCIAL	)	
SERVICES, L.P., a Texas Corporation,	)	
individually and as agent of DELL,	)	
	)	
Defendant.	)	

**DEFENDANT DELL FINANCIAL SERVICES' MOTION TO EXTEND TIME  
TO ANSWER OR OTHERWISE PLEAD**

Defendant Dell Financial Services ("DFS"), by its undersigned counsel, hereby respectfully moves this Court for an extension of time, to and including July 16, 2008, for DFS to answer or otherwise plead to Plaintiff's complaint. In support thereof, DFS states as follows:

1. DFS was served on or about May 12, 2008 with Summons and Plaintiff's complaint. On June 11, 2008, DFS removed the action to this federal court. DFS's answer or other responsive pleadings are due June 16, 2008.

2. DFS is investigating the underlying allegations, and is not yet able to respond to Plaintiff's complaint. Therefore, DFS seeks an extension of 30 days to and including July 16, 2008 to answer or otherwise plead.

3. DFS has attempted to contact Plaintiff's counsel by telephone on several occasions to obtain Plaintiff's counsel's agreement to this motion, as well as to discuss settlement of this matter. Plaintiff's counsel has not returned DFS's telephone calls.

WHEREFORE, Dell Financial Services respectfully prays that the Court extend the time to and including July 16, 2008 for Dell Financial Services to answer or otherwise plead to Plaintiff's complaint in this matter, and for all other and further relief deemed appropriate by the Court.

Dated: June 13, 2008

Respectfully submitted,

DELL FINANCIAL SERVICES,

By: /s/ Mary E. Anderson  
One of Its Attorneys

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